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December 7, 2015

VIA ECF

The Hon. Magistrate Judge Ronald L. Ellis
United States District Judge
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Jeanette Fernandez v. Mizu For Hair New York, LLC, d/b/a Mizu For Hair, and Mizu For Hair LLC, d/b/a Mizu For Hair, 15 CV 00523 (RA)*

Dear Judge Ellis:

We represent the Plaintiff in the above-referenced action. We write in response to Defendants' letter dated December 4, 2015.

In Plaintiff's letter dated December 3, 2015, Plaintiff specifically requested an in-person conference so that we may carefully and efficiently review any documents and information related to the disputes. Additionally, Defendants have local counsel, Ms. Wendy Melk from Jackson Lewis P.C., who appeared at the court-mandated May 27, 2015 mediation and who will be involved in the deposition phase of discovery in this action.

Accordingly, we respectfully renew our request for an in-person, pre-motion conference with the Court related to Plaintiff's anticipated motion to compel discovery. As an alternative, if the Court decides to grant Defendants' request to appear telephonically, we request that the Court permit the Plaintiff appear in-person.

Thank you for your time and attention to this matter.

Respectfully submitted,



Walker G. Harman, Jr.

cc: Susan M. Roberts, Esq. (via ECF)